

Nancianne Edwards

May 19, 2015

Nace vs. FCA, et al.

Page 1

IN THE UNITED STATES DISTRICT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
CIVIL TRIAL DIVISION

JAMES NACE, et al : CIVIL ACTION
vs. :
PENN RIDGE SCHOOL DISTRICT, :
et al. : NO. 15-333

Tuesday, May 19, 2015

COPY

Oral deposition of NANCIANNE EDWARDS, held at
BEGLEY, CARLIN & MANDIO, LLP, 680 Middletown Boulevard,
Oxford Valley Mall, Langhorne, Pennsylvania, beginning
at 3:00 p.m., on the above date, before LANCE A.
BRUSILOW, Registered Professional Reporter, Notary
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Nancianne Edwards

Nace vs. FCA, et al.

May 19, 2015

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		<p>1 (It is hereby agreed by and among 2 counsel that signing, sealing, certification and 3 filing are waived; and that all objections, except 4 as to the form of the question, are reserved until 5 the time of trial)</p> <p>6 NANCIANNE EDWARDS, having been first 7 duly sworn, was examined and testified as follows: 8 (EXAMINATION)</p> <p>9 BY MR. GROTH:</p> <p>10 Q. Good afternoon, Ms. Edwards. My name is David 11 Groth, and I represent the Naces in a lawsuit that's 12 currently pending in the Eastern District court in 13 Philadelphia.</p> <p>14 The subject matter of that litigation is 15 claims involving an individual named Eric Romig, who 16 has pleaded guilty to a number of felonies in 17 connection with some sexual abuse of Ms. Elizabeth 18 Nace, is the name of the young lady, the Nace's 19 daughter, that took place back in the late spring and 20 summer of 2013.</p> <p>21 I'm not sure if you read anything about the 22 case. It was in all the local newspapers and widely 23 reported about exactly what Mr. Romig did while he was 24 Elizabeth Nace's softball coach.</p> <p>1 I have asked a representative of Quakertown to 2 testify concerning some facts regarding Mr. Romig after 3 learning that Mr. Romig was a coach at Quakertown High 4 School for a period of years going back, I think, to 5 2007 up until 2009, and I think he resigned on January 6 5th, 2010, based upon documents that Mr. Garton was 7 kind enough to forward to us back on April 1st, 2015.</p> <p>8 Those documents, by the way, have all been 9 marked as Romig exhibit number two on May 4th, 2015, as 10 part of Mr. Romig's deposition that we took on that 11 date.</p> <p>12 I'm trying to get some information regarding 13 Mr. Romig's employment history and activities while 14 employed at Quakertown High School, and I sent Mr. 15 Garton a deposition notice asking him to produce a 16 representative or employee or designee of Quakertown 17 Community School District -- I think that's the correct 18 name --</p> <p>19 MR. GROTH: I think that's the correct 20 name. Is that correct?</p> <p>21 MR. GARTON: Correct.</p> <p>22 BY MR. GROTH:</p> <p>23 Q. (Continuing) -- Quakertown Community School 24 District to review the topics that were attached to the</p>

2 (Pages 2 to 5)
Appendix1011

Nancianne Edwards

Nace vs. FCA, et al.

May 19, 2015

<p style="text-align: right;">Page 10</p> <p>1 (Exhibit Quakertown-1 was marked for 2 identification)</p> <p>3 BY MR. GROTH:</p> <p>4 Q. I've marked as Quakertown exhibit one a copy 5 of the deposition notice that is dated April 28, 2015, 6 and that deposition notice has attached to it a list of 7 topics to be discussed during the deposition, and there 8 may be related subject matters related to these topics 9 that we'll discuss as well.</p> <p>10 Let me show you this deposition exhibit 11 Quakertown exhibit one, and ask if you've seen the 12 attached list of topics to be discussed.</p> <p>13 A. Yes, I saw an electronic copy.</p> <p>14 Q. And are you the person -- maybe Mr. Garton can 15 represent this -- are you the person that Quakertown 16 Community School District has designated to respond to 17 that deposition notice and to discuss those topics?</p> <p>18 MR. GARTON: Yes.</p> <p>19 MR. GROTH: Okay.</p> <p>20 BY MR. GROTH:</p> <p>21 Q. Let me just get a little information about 22 you, first of all. Are you employed by the Quakertown 23 Community School District?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 12</p> <p>1 handle employee evaluations for coaches? Specifically 2 not teachers or other staff or whatever, but coaches.</p> <p>3 A. I don't know.</p> <p>4 Q. Do you know if they were evaluated on a yearly 5 basis?</p> <p>6 A. I don't believe so, in a formal sense.</p> <p>7 Q. By "formal," I would take it that you're 8 referring to something that's in writing?</p> <p>9 A. Correct.</p> <p>10 Q. What about in an informal sense, something 11 that's conveyed verbally or in some other method?</p> <p>12 A. I do not have personal knowledge of that.</p> <p>13 Q. So, is my understanding correct that you don't 14 know whether or not any formal or informal evaluations 15 were done for people in Mr. Romig's position, for 16 example, who was a softball coach at the high school?</p> <p>17 A. Correct.</p> <p>18 Q. Who would know that? Who presently at 19 Quakertown might know that?</p> <p>20 A. I do not know of any individual at Quakertown 21 that would know that information.</p> <p>22 Q. There were a number, according to the 23 documents that Mr. Garton provided, of assistant 24 coaches while Mr. Romig was there, including Beth Rice,</p>
<p style="text-align: right;">Page 11</p> <p>1 Q. What is your position?</p> <p>2 A. Assistant superintendent.</p> <p>3 Q. And how long have you held that position?</p> <p>4 A. Since July 1, 2014.</p> <p>5 Q. Were you employed by the Quakertown Community 6 School District prior to that?</p> <p>7 A. Yes.</p> <p>8 Q. In what capacity?</p> <p>9 A. Director of human resources.</p> <p>10 Q. When did you start in that position?</p> <p>11 A. September of 2003.</p> <p>12 Q. Up until July of 2014?</p> <p>13 A. Correct.</p> <p>14 Q. And can you just briefly describe your duties 15 and responsibilities as director of human resources 16 during that period of time?</p> <p>17 A. I was responsible for all aspects of human 18 resources: Hiring, firing; in terms of 19 recommendations, labor relations, performance 20 management, employee benefits.</p> <p>21 Q. Would that include employee evaluations?</p> <p>22 A. Yes.</p> <p>23 Q. And back in -- say between 2007 and the end of 24 2009, how did Quakertown Community School District</p>	<p style="text-align: right;">Page 13</p> <p>1 Mike Cherrybon and Diane Cranmer.</p> <p>2 Are any of those people still employed at 3 Quakertown?</p> <p>4 A. Yes.</p> <p>5 Q. Which ones?</p> <p>6 A. Mike Cherrybon.</p> <p>7 Q. What's his position?</p> <p>8 A. He is a math teacher.</p> <p>9 Q. Is he a coach, also?</p> <p>10 A. I don't know currently.</p> <p>11 Q. One of the subjects to be discussed as listed 12 on Quakertown exhibit one was Eric Romig's hiring 13 employment position, employment evaluations and/or 14 reviews and termination or resignation.</p> <p>15 Did you do any -- strike that. As I 16 understand it, you don't have any personal knowledge as 17 to whether or not Mr. Romig ever had a formal or 18 informal employment evaluation while he was employed at 19 Quakertown. Is that correct?</p> <p>20 A. Correct.</p> <p>21 Q. Did you do any searching? Did you talk to 22 anybody? Did you try to look for documents or records 23 to indicate whether or not he had ever been given any 24 type of employment evaluation?</p>

4 (Pages 10 to 13)

Appendix1012

215.772.1717

Nancianne Edwards

Nace vs. FCA, et al.

May 19, 2015

<p style="text-align: right;">Page 14</p> <p>1 A. All records would have been included in the 2 personnel file that we provided. 3 Q. And are you the person that, in response to a 4 request by Mr. Garton, are you the person who actually 5 did the search of Quakertown's records to find out 6 whether or not there were evaluations and terminations 7 or applications for a job, that type of thing, in his 8 employment file? 9 A. I had the manager of human resources retrieve 10 the personnel file, and all documents would have been 11 included in that. 12 Q. And who is that? 13 A. Zachary Schoch. 14 Q. And he's a manager of what? 15 A. He's the manager -- well, now he's director of 16 human resources. 17 Q. And he did that search of the employment 18 records of Mr. Romig at your request? 19 A. Correct. 20 Q. And turned them over to you? 21 A. He reported to me that he had located the 22 file, and at my direction he made copies of the file 23 and provided it to Mr. Garton. 24 Q. What is that file called? What do you call</p>	<p style="text-align: right;">Page 16</p> <p>1 Pennridge? Is that correct? 2 A. Yes. 3 Q. Did he go any place between Quakertown and 4 Pennridge? Do you know? 5 A. I do not know. 6 Q. Was he the person who hired Mr. Romig? 7 A. I believe so, but there would have been a hire 8 sheet in the personnel file, most likely. 9 Q. Did you find one -- strike that. Did you have 10 an opportunity to look at and reviews the documents 11 that were in the personnel file that was turned over to 12 Mr. Garton? 13 A. At the time the file was pulled, yes. 14 Q. Do you recall seeing an application regarding 15 Mr. Romig's hiring? 16 A. I don't recall one way or the other. 17 Q. Do you know whether or not Mr. Babb knew Mr. 18 Romig prior to his hiring at Quakertown? 19 A. I do not know. 20 Q. We'll go through the documents after I do some 21 more general questioning. 22 Other than asking Zachary Schoch to look for 23 the personnel file and obtain it and copy it so it 24 could be provided to Mr. Garton, did you communicate in</p>
<p style="text-align: right;">Page 15</p> <p>1 that file? 2 A. The personnel file. 3 Q. And if there were employee evaluations, formal 4 or written in some form, whether it's an email or a 5 letter or some other document, would that document 6 customarily be kept in the personnel file? 7 A. Yes. 8 Q. If during the time that Mr. Romig was a coach 9 at Quakertown he was the senior high school girls 10 softball coach, according to the documents, between 11 2007 and the very beginning of 2010, do you know who 12 would be the person responsible for doing the 13 evaluation, whether it was a formal or an informal 14 evaluation? 15 A. It would have been the athletic director's 16 responsibility. 17 Q. Who was that at the time? 18 A. David Babb for most of the time that Mr. Romig 19 was our employee. 20 MS. OLSZEWSKI: Could you keep your 21 voice up? 22 THE WITNESS: I will try. 23 BY MR. GROTH: 24 Q. Mr. Babb eventually left Quakertown to go to</p>	<p style="text-align: right;">Page 17</p> <p>1 any way with other employees of Quakertown in order to 2 get information to address these topics that are listed 3 on the deposition notice? 4 A. Yes. 5 Q. Who was that? 6 A. I spoke with Sylvia Kalazs. 7 Q. And what issues did you speak to her about? 8 A. I asked her if she had any information related 9 to Eric Romig or his employment at Quakertown. 10 Q. Was she the athletic director at Quakertown 11 immediately after David Babb left? 12 A. I don't recall whether there was a gap between 13 when Mr. Babb left and Ms. Kalazs started, but she was 14 the next athletic director, yes. 15 Q. But chronologically -- it may not have been 16 the next day, but she was the next person to hold that 17 position? 18 A. Correct. I don't recall the timing in 19 between. 20 Q. Okay. Again, can you describe for us the 21 substance of your conversation or conversations with 22 Ms. Kalazs regarding Mr. Romig's employment at 23 Quakertown? 24 A. She stated to me that she was not -- I don't</p>

5 (Pages 14 to 17)

Appendix1013

215.772.1717

Nancianne Edwards

Nace vs. FCA, et al.

May 19, 2015

<p>1 believe she had met him. Her only contact with him was 2 when he notified her that he was resigning due to 3 health reasons, and that was the extent of her 4 knowledge of him or communication with him.</p> <p>5 Q. Do you know whether or not she ever had any 6 direct conversation with him or communication with him, 7 either on the phone or in person, regarding his health 8 issues or the reasons he was giving for resigning?</p> <p>9 A. She did not state to me that he gave any 10 details other than to state that he was resigning for 11 health reasons.</p> <p>12 Q. I understand that. My question was, do you 13 know whether or not, after he provided that 14 information -- and I think we'll see a letter or some 15 kind of email from him to her indicating his 16 resignation -- do you know whether or not she had any 17 conversation with him regarding his stated reason for 18 his resignation or any other reason for his 19 resignation?</p> <p>20 A. To my knowledge, she did not beyond what I've 21 just stated.</p> <p>22 Q. When you talked to Ms. Kalazs, did the topic 23 come up of whether or not at the time Mr. Romig was 24 working for Quakertown he was also coaching for another</p>	<p>Page 18</p> <p>1 A. William Harner. 2 Q. When Mr. Romig was employed by Quakertown, 3 would his direct supervisor have been the athletic 4 director?</p> <p>5 A. Yes. 6 Q. So, it would have been Mr. Babb until Mr. Babb 7 left to take another position, and then after that it 8 would have been Ms. Kalazs.</p> <p>9 A. Had Mr. Romig returned to coach the next 10 season, it would have been Ms. Kalazs. I don't believe 11 she ever supervised him.</p> <p>12 Q. As I'm looking at Romig exhibit two, all the 13 documents that Quakertown supplied to us. I see an 14 email from Eric Romig to Sylvia Kalazs dated January 15 5th, 2010, at 2:33 a.m., in which he informs her of his 16 resignation.</p> <p>17 I'll give you a chance to take a look at that 18 document. Have you seen that document before?</p> <p>19 A. I think that was in the file, yes.</p> <p>20 Q. Does that indicate to you that she was, in 21 fact, the athletic director at the time of his 22 resignation?</p> <p>23 A. Yes, I believe I already said that she was the 24 athletic director at the time of his resignation.</p>
<p>Page 19</p> <p>1 school, Faith Christian Academy? Did you ask her about 2 that at all?</p> <p>3 A. I was not aware of that, no.</p> <p>4 Q. Okay. Do you have any -- I should have asked 5 this first probably -- do you have any personal 6 knowledge of Mr. Romig's employment history while he 7 was employed at Quakertown?</p> <p>8 And by that I mean did you have anything to do 9 with his hiring or his resignation or evaluations or 10 paying him his salary or anything of that nature? Did 11 you have any personal contact with him?</p> <p>12 A. I had no personal contact with him.</p> <p>13 Q. Do you ever recall speaking to him at any time 14 during the years that he worked at Quakertown?</p> <p>15 A. No.</p> <p>16 Q. Other than your conversations with Mr. Schoch 17 and Ms. Kalazs regarding the topics to be discussed on 18 the deposition notice, did you have any other 19 conversations with any Quakertown employees regarding 20 Mr. Romig's employment tenure at Quakertown?</p> <p>21 A. Other than notifying the superintendent of the 22 subpoena, I don't recall any other conversations 23 regarding it.</p> <p>24 Q. And who is the superintendent?</p>	<p>Page 21</p> <p>1 Q. So, she would have had supervisory control 2 over him for some period of time before this 3 resignation took place.</p> <p>4 A. I don't recall the date that she began in the 5 position of athletic director in relation to when the 6 end of the softball season would have been the previous 7 year.</p> <p>8 Q. Okay.</p> <p>9 A. But I don't believe she ever supervised him.</p> <p>10 Q. Between 2007 and 2009, when Mr. Romig was 11 employed at Quakertown, did you have anything to do at 12 all with the sports program or the girls softball 13 program specifically?</p> <p>14 A. No.</p> <p>15 Q. When is the girls softball season -- strike 16 that. When was it back in 2008, 9 and 10?</p> <p>17 A. I assume it was a spring sport, but I do not 18 know.</p> <p>19 Q. When a new employee is hired by Quakertown or 20 was hired during that period of time by Quakertown, 21 were they given some policy materials by the school 22 district relating to things such as sexual harassment 23 and drug use or drug-free policy?</p> <p>24 A. I do not recall which specific things were</p>

6 (Pages 18 to 21)

Appendix1014

215.772.1717

Nancianne Edwards

Nace vs. FCA, et al.

May 19, 2015

<p style="text-align: right;">Page 22</p> <p>1 given out at the time Mr. Romig would have been hired, 2 but there are policies that are given to employees and 3 they sign to acknowledge receipt. So, anything he 4 signed to acknowledge receipt would be in the personnel 5 file.</p> <p>6 Q. In the file that was sent to us there are two 7 acknowledgments signed by Mr. Romig: One says 8 "Quakertown Community School District. Important: 9 Must be returned," and it says "Proof of notification 10 that you have been made aware of and have received a 11 copy of the unlawful harassment policy is required. 12 Please sign, detach and return this slip to the human 13 resources department" and there is a signature and a 14 date of April 19th, 2008. And there is a similar 15 acknowledgment for a copy of the drug-free workplace 16 policy, also. I think it's the next document after 17 that.</p> <p>18 A. Okay.</p> <p>19 Q. Are those the type of acknowledgements that 20 you were just talking about?</p> <p>21 A. Yes.</p> <p>22 Q. And is every employee given the material that 23 they are acknowledging on those documents?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Have you been trained in the requirements of 2 that law?</p> <p>3 A. We have not done our formal training yet, no, 4 but I'm familiar with the requirements of the law.</p> <p>5 Q. When you say you haven't done it yet, what 6 does that mean?</p> <p>7 A. There is a specific training module that is 8 required to be given to all employees. It consists of 9 three hours of very specific training once every five 10 years.</p> <p>11 Q. Would that include giving it to a new hire. .</p> <p>12 A. Yes.</p> <p>13 Q. . .upon their hiring?</p> <p>14 A. Yes.</p> <p>15 Q. And when you say "training module," that's 16 something where actually some trainer comes in and 17 trains somebody in a conference room-setting or some 18 other type of setting?</p> <p>19 A. The module that we are using is electronic.</p> <p>20 Q. Electronic. Do you go on a website or 21 something?</p> <p>22 A. Yes.</p> <p>23 Q. How long has that been in place?</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. In the unlawful harassment policy material, 2 can you tell me what basically that policy encompasses, 3 what kind of activity and what the material consists of 4 that's given?</p> <p>5 A. I do not have the policy committed to memory, 6 I'm sorry.</p> <p>7 Q. Well, what types of things? When it generally 8 talks about unlawful harassment policy -- would that 9 include sexual harassment, first of all?</p> <p>10 A. I'm sure that it would, but I don't have the 11 policy in front of me to review.</p> <p>12 Q. Other than providing Mr. Romig with a copy of 13 these policies -- and I take it these were in writing 14 or were in writing at the time?</p> <p>15 A. They are in writing now and were in writing 16 then.</p> <p>17 Q. And is a copy given to the employee to keep?</p> <p>18 A. Yes.</p> <p>19 Q. Are you familiar with the Child Protective 20 Services law at all?</p> <p>21 A. Yes.</p> <p>22 Q. How is it that you're familiar with that?</p> <p>23 A. I'm responsible for overseeing human 24 resources.</p>	<p style="text-align: right;">Page 25</p> <p>1 A. The Bucks County IU developed the module for 2 Bucks County school districts, and they are expecting 3 to release it momentarily.</p> <p>4 Q. It hasn't been used yet?</p> <p>5 A. It has to be approved by the Pennsylvania 6 Department of Education before it can be used to meet 7 the requirements of the law, and it is currently in 8 that approval process.</p> <p>9 Q. Back in 2008, 9 and 10, there was no such 10 training module, correct?</p> <p>11 A. No, correct.</p> <p>12 Q. Was there any other type of training that was 13 done at the time? And by that I mean where employees 14 were actually called in and given a seminar or a speech 15 or explained verbally exactly what the harassment 16 policy was, including sexual harassment.</p> <p>17 A. No, there was not specific training on that.</p> <p>18 Q. So, back at the time Mr. Romig was there, it 19 would be a situation where he would be provided with 20 the policy materials in writing and then he would 21 acknowledge that he received it, but in terms of 22 reading it and understanding it and whatever, that was 23 his obligation.</p> <p>24 A. Yes.</p>

Nancianne Edwards

May 19, 2015

Nace vs. FCA, et al.

<p style="text-align: right;">Page 26</p> <p>1 Q. Okay. If there were questions about any of 2 the policies that he was made aware of by virtue of a 3 written handout, would you have been the person, as HR 4 head, to consult to address any questions or issues 5 with regard to the policy?</p> <p>6 A. Yes, most likely.</p> <p>7 Q. Do you recall him ever doing that?</p> <p>8 A. No, he did not.</p> <p>9 Q. This acknowledgement that we just looked at 10 with regard to the unlawful harassment policy just says 11 that it was received -- that the employee has been made 12 aware of and has received a copy of the policy.</p> <p>13 Is there anything that Quakertown did at the 14 time to make sure that the employee actually read the 15 material that was given to the employee?</p> <p>16 A. No.</p> <p>17 Q. Is there anything done now to make sure that 18 they have actually reviewed the material that they have 19 been given?</p> <p>20 A. Well, they're signing an acknowledgement that 21 indicates that they have received it.</p> <p>22 Q. And I was going a step beyond that. It says 23 "This is an acknowledgment that you have been made 24 aware of and have received a copy of."</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. Oh, okay. And the other requests that you're 2 talking about, the prior requests, that was before the 3 request that was made in this case. Is that correct?</p> <p>4 A. Yes, it was sometime ago.</p> <p>5 Q. Were you the person who responded to that 6 prior request for the personnel file?</p> <p>7 A. My office would have. I don't recall if I did 8 it personally or had someone pull the file.</p> <p>9 Q. Do you know whether or not the file that was 10 pulled and provided to whoever requested it before the 11 request in this case was the same file that was 12 provided to us?</p> <p>13 A. It should have been, yes.</p> <p>14 Q. But you don't know for a fact whether or not 15 that was somebody from the District Attorney's Office 16 in Bucks County or the county detective's office.</p> <p>17 A. I don't recall.</p> <p>18 Q. Do you recall seeing the written request, the 19 prior written request?</p> <p>20 A. Well, I must have seen it because I'm aware 21 that it existed, and I got the file or directed someone 22 else to get the files.</p> <p>23 Q. And do you recall that the form of the prior 24 written request was a subpoena?</p>
<p style="text-align: right;">Page 27</p> <p>1 My question was one step beyond that: Was 2 there any follow-up, then, to see if the employee ever 3 actually read the policy?</p> <p>4 A. No.</p> <p>5 Q. Did you follow at all the reporting in the 6 press -- the media, print media, visual media -- 7 regarding Mr. Romig's problems at Pennridge?</p> <p>8 A. I am aware of it. I don't recall whether I'm 9 aware of it because I read a news account or someone 10 spoke to me about it, but I am generally aware of it.</p> <p>11 Q. At some point in the criminal investigation of 12 Mr. Romig with regard to his activities with Elizabeth 13 Nace at Pennridge High School, did anybody from the 14 Bucks County District Attorney's Office or the Bucks 15 County Detectives come to Quakertown to ask questions 16 about his employment history at Quakertown?</p> <p>17 A. Not that I recall.</p> <p>18 Q. You're not personally aware of any detective 19 making inquiries at Quakertown with regard to Mr. 20 Romig's employment history or personnel records or 21 anything like that?</p> <p>22 A. I recall receiving this request and a prior 23 request, but I don't recall who the prior request was 24 from, a subpoena for his personnel records.</p>	<p style="text-align: right;">Page 29</p> <p>1 A. I don't recall what it said, but if it were 2 not a subpoena, then we would not have provided the 3 documents.</p> <p>4 Q. The assistant district attorney who handled 5 the case against Mr. Romig with regard to Elizabeth 6 Nace was Jennifer Schorn. Does that name ring a bell 7 at all?</p> <p>8 A. No, sir.</p> <p>9 Q. The detectives that investigated the case for 10 Bucks County were David Kemmemer and another detective 11 named Slattery. Do those names ring a bell with you at 12 all?</p> <p>13 A. No.</p> <p>14 Q. Do you know if Quakertown turned over any 15 additional information in response to that prior 16 request regarding Mr. Romig other than the personnel 17 file?</p> <p>18 A. Not to my knowledge.</p> <p>19 Q. Do you know if there was any contact made with 20 any representatives or employees of Quakertown by the 21 Bucks County district attorney or assistant district 22 attorney or the Bucks County Detectives after you 23 provided those documents?</p> <p>24 A. Not that I recall.</p>

8 (Pages 26 to 29)

Appendix1016 215.772.1717

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Nancianne Edwards

Nace vs. FCA, et al.

May 19, 2015

<p style="text-align: right;">Page 30</p> <p>1 Q. Do you ever recall reading any information in 2 the print media to the effect that there were some 3 suspicions based upon the investigation of Mr. Romig 4 that he may have engaged in sexual abuse or sexual 5 harassment while he was employed at Quakertown? 6 A. No, I don't recall reading that. 7 Q. Did it ever come to your attention at any time 8 before today that Bucks County Detectives interviewed 9 any former students of Quakertown with regard to Mr. 10 Romig's activities and employment at Quakertown? 11 A. I was not aware of that. 12 Q. Are you familiar with a prior student who 13 attended Quakertown named Alicia Hughes? 14 A. Yes. 15 Q. How do you know her? 16 A. She's a current employee. 17 Q. In what capacity? 18 A. She was a special-education teacher. 19 Q. Was she like first grade or second grade or 20 something? 21 A. Special-education. 22 Q. That's not grade-dependent? 23 A. No. 24 Q. How long has she been employed by Quakertown?</p>	<p style="text-align: right;">Page 32</p> <p>1 members and that type of thing? 2 A. I have never looked at a yearbook. I assume 3 it contains such photographs, but I don't know. 4 Q. Do you recall approximately when you first 5 became aware of Mr. Romig's criminal problems with his 6 employment at Pennridge? 7 A. I don't specifically recall, no. 8 Q. Again, just to give you some kind of time 9 line, I think he was arrested on October 1st of 2013 10 and pled guilty sometime in January 2014, and was 11 sentenced to three and a half to seven years in prison. 12 Do you recall learning any of that information 13 when you saw or read media reports? 14 A. I am generally aware of what occurred, but I 15 couldn't tell you exactly when or through what medium I 16 became aware. 17 Q. Regardless of how you became aware, you were 18 aware when you saw these media reports that he had been 19 a prior employee at Quakertown, correct? 20 A. Actually, no. 21 Q. When did you first become aware of that? 22 A. I believe when we received the first subpoena. 23 Q. At that time, whether the subpoena was from 24 the DA or County Detectives or some other agency or</p>
<p style="text-align: right;">Page 31</p> <p>1 A. I believe this is her second year. 2 Q. Did you ever discuss Mr. Romig with Alicia 3 Hughes at any time? 4 A. No. 5 Q. Did you ever find out from any source that 6 Alicia Hughes had been contacted by the Bucks County 7 detectives to talk to her about Mr. Romig? 8 A. No. 9 Q. So, this is all, what I'm telling you, new 10 today? 11 A. Yes. 12 Q. Would Quakertown, in its records, have a list 13 of all of the members of the high school girls softball 14 team for the years during which Mr. Romig coached? 15 A. I don't know. 16 Q. Would there be something in a yearbook or some 17 other type of athletic department publication that 18 would indicate who the team members were? 19 A. I don't know. 20 Q. Is there a yearbook that's published every 21 year? 22 A. Yes. 23 Q. And does that generally have pictures of 24 sports teams and photos -- photos of sports team</p>	<p style="text-align: right;">Page 33</p> <p>1 whatever, was there any internal review at Quakertown 2 of Mr. Romig's employment history while he was at 3 Quakertown? 4 In other words, did anybody get out his 5 personnel file, take a look at it, start asking some 6 questions about, you know, what he may or may not have 7 done while he was a coach at Quakertown? 8 A. Well, that's an awfully long question. 9 Q. I can shorten it for you if you like. 10 A. When I received the subpoena, then we checked 11 the database to see if, in fact, he had been an 12 employee. And when we saw that he had been an 13 employee, then we retrieved his personnel file, which 14 would have been archived in the vault by that time. 15 So, those are sort of steps we followed once 16 we received notification of the request for his 17 records. 18 Q. And are those records kept on the premises? 19 A. Yes. 20 Q. And where is that? 21 A. 100 Commerce Drive, Quakertown. 22 Q. I think my question before that went one step 23 beyond that: In addition to retrieving the personnel 24 file from archives, was there any internal review of</p>

9 (Pages 30 to 33)

Appendix1017
215.772.1717

Nancianne Edwards

Nace vs. FCA, et al.

May 19, 2015

<p style="text-align: right;">Page 34</p> <p>1 Mr. Romig's employment history in view of this request 2 for his personnel file?</p> <p>3 In other words, was there a discussion between 4 any administration or staff of Quakertown regarding 5 their recollections of Mr. Romig's employment history?</p> <p>6 A. No.</p> <p>7 Q. As part of your search for information to 8 respond to the topics that were attached to the 9 deposition notice, did you attempt to contact Mr. Babb, 10 David Babb, since he was the person who you believe 11 hired Mr. Romig and also the person who was the 12 athletic director during the bulk of Mr. Romig's tenure 13 at Quakertown?</p> <p>14 A. No, I did not.</p> <p>15 Q. When is the last time you had any contact with 16 Mr. Babb?</p> <p>17 A. It would have been a couple of months 18 following his resignation.</p> <p>19 Q. For what purpose was that?</p> <p>20 A. He did not repay final overpaid salary. We 21 made several attempts to collect it after his last day 22 of work.</p> <p>23 Q. Did you ever do that?</p> <p>24 A. No, he did not ever repay it.</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. Was Mr. Babb given employment evaluations 2 during his tenure at Quakertown as athletic director?</p> <p>3 A. Yes, he was.</p> <p>4 Q. Who evaluated him?</p> <p>5 A. The high school principal.</p> <p>6 Q. Who was that?</p> <p>7 A. It would have been several different 8 individuals over the term of his employment.</p> <p>9 Q. What about in 2008 to 9?</p> <p>10 A. I want to say that was when Anita Serge was 11 high school principal, but I may have the timing off.</p> <p>12 Q. Let me just go down a list of topics that were 13 attached to the deposition notice we've marked as 14 Quakertown exhibit number one.</p> <p>15 The first subject to be discussed was "Eric 16 Romig's hiring, employment position, employment 17 evaluations and/or reviews and 18 termination/resignation."</p> <p>19 Would it be correct to say that all the 20 information that you have about those issues is 21 basically contained in the personnel record that Mr. 22 Garton provided to the attorneys?</p> <p>23 A. Yes.</p> <p>24 Q. Item number two to be discussed is</p>
<p style="text-align: right;">Page 35</p> <p>1 Q. Do you know how much money it was?</p> <p>2 A. I don't recall.</p> <p>3 Q. Was it thousands of dollars?</p> <p>4 A. I don't recall.</p> <p>5 Q. Did he ever respond to your inquiries?</p> <p>6 A. Not to my recollection.</p> <p>7 Q. Were those inquiries in writing or verbal?</p> <p>8 A. As I recall, I sent him a couple of letters: 9 First notice, second notice, that kind of thing.</p> <p>10 Q. Did you ever turn it over to a collection 11 agency?</p> <p>12 A. No.</p> <p>13 Q. So, at the time that you were doing that, 14 sending him letters about his failure to repay his 15 salary that was overpaid, you didn't have personal 16 contact with him or direct contact with him. It was 17 just sending him letters?</p> <p>18 A. I had several conversations with him about the 19 overpayment, but I believe it was prior to his actual 20 date of resignation and then afterwards followed up in 21 writing. That's my recollection.</p> <p>22 Q. Can you tell me why he resigned?</p> <p>23 A. My understanding is he resigned to accept a 24 position at Penridge. He preferred to work there.</p>	<p style="text-align: right;">Page 37</p> <p>1 "Complaints, allegations, or accusations regarding Eric 2 Romig's job performance or behavior, including but not 3 limited to any suspicious and/or rumors regarding any 4 suspected inappropriate behavior toward female students 5 or athletes, such as inappropriate physical contact, 6 texting, language, photos or videos directly to, or 7 exchanged with, female students."</p> <p>8 What attempts did you make to obtain any 9 information that would be responsive to that subject or 10 topic?</p> <p>11 A. I was the person to whom such complaints would 12 have been directed, and I received none during the term 13 of his employment.</p> <p>14 Q. If you had received a complaint or an 15 accusation from a female student regarding any coach -- 16 not just him but any coach's conduct, whatever -- would 17 that be something that would be put in writing and put 18 in a file somewhere?</p> <p>19 A. Yes.</p> <p>20 Q. What's the name of the file that would be put 21 in?</p> <p>22 A. It would be in the personnel file.</p> <p>23 Q. No other file? There wasn't a separate file 24 established for that type of accusation or complaint?</p>

10 (Pages 34 to 37)

Appendix1018

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Nancianne Edwards

Nace vs. FCA, et al.

May 19, 2015

<p>1 A. No.</p> <p>2 Q. Back in 2007 or 8 or 9, if there was an 3 accusation made or allegation made against an employee 4 by a female student, what was the process back then to 5 investigate that allegation or accusation? Just 6 generally speaking, what was the process?</p> <p>7 A. Well, the process for any allegation of 8 misconduct would be conducting an interview with the 9 complainant and documenting the responses; requesting 10 them to put their complaint in writing so that we have 11 a written record of exactly what they said; 12 interviewing whoever the person who is alleged to have 13 committed the misconduct, interviewing that person, 14 with union reputation if they were a bargaining unit 15 employee, questioning them; determining the names of 16 any witnesses or other people who might have firsthand 17 knowledge of whatever the misconduct is, interviewing 18 those people; reaching a conclusion about what I 19 believe to have occurred in the situation, determining 20 the appropriate level of discipline for the employee.</p> <p>21 If there was an allegation that required a 22 ChildLine report, that report would have been made -- 23 now it's made immediately. The procedure at that time 24 was to do at least a preliminary investigation to make</p>	Page 38	<p>1 employee would be directed to you -- basically to the 2 administration -- to investigate it as opposed to the 3 employee reporting it directly to ChildLine. Was that 4 the process?</p> <p>5 A. I think they do both.</p> <p>6 Q. They do both?</p> <p>7 A. I believe they would do both.</p> <p>8 Q. Are you aware whether or not the law changed 9 now so that, for example, a teacher is supposed to 10 report directly to ChildLine after December 31st, 2014?</p> <p>11 A. Yes.</p> <p>12 Q. All right.</p> <p>13 A. Well, everyone with knowledge is required to 14 report now as soon as they have the knowledge, without 15 waiting for any type of investigative process to take 16 place.</p> <p>17 Q. Back in 2007, 8 and 9, if there was an 18 allegation made by a female student against a male 19 employee of Quakertown that there was inappropriate 20 texting, texting of a sexual nature, texting to try to 21 induce or persuade somebody to engage in some kind of 22 sexual activity with an employee, is that the type of 23 thing that you would have as head of HR reported to 24 ChildLine?</p>	Page 40
<p>1 sure that whatever it was was founded prior to making a 2 report, which was in compliance with the law at that 3 time.</p> <p>4 Q. Let me just ask about that for a second. You 5 said now notifying ChildLine is immediate upon the 6 accusation?</p> <p>7 A. Yes.</p> <p>8 Q. That changed December 31st, 2014?</p> <p>9 A. Yes.</p> <p>10 Q. Before that, if I understand your testimony 11 correctly, was it the process that you would do the 12 initial investigation before determining whether or not 13 to contact ChildLine?</p> <p>14 A. Yes. The previous process was to at least do 15 an initial review of the information to make sure that 16 there was actually a complaint that needed to be 17 reported before reporting it. Now we just report it 18 and then do the investigation subsequently.</p> <p>19 Q. And back then the process was, if there was an 20 employee that had brought an allegation or 21 accusation -- strike that.</p> <p>22 The process previously, before December 31st, 23 2014, was that if an employee learned of an accusation 24 or an allegation of sexual abuse of a student, that</p>	Page 39	<p>1 A. Yes. I would have removed the employee from 2 work pending the completion of the investigation.</p> <p>3 Q. Even if there was no allegation or accusation 4 of any physical contact.</p> <p>5 A. Yes.</p> <p>6 Q. What about if the allegation or accusation was 7 that there was a request made for sexually explicit 8 photographs or videos made by an employee of Quakertown 9 to a student?</p> <p>10 A. Yes.</p> <p>11 Q. That would require a notification to the 12 ChildLine, too, correct?</p> <p>13 A. That would have been reported to ChildLine, 14 yes.</p> <p>15 Q. Is there a specific office or person at the 16 Department of Public Welfare that was responsible for 17 addressing or responding to complaints that you would 18 have made to ChildLine with regard to the behavior of 19 one of your employees?</p> <p>20 A. A specific person?</p> <p>21 Q. Yes --</p> <p>22 A. Not to my knowledge.</p> <p>23 Q. -- back in 2007, 8 or 9 --</p> <p>24 A. Not to my knowledge.</p>	Page 41

Nancianne Edwards

May 19, 2015

Nace vs. FCA, et al.

<p style="text-align: right;">Page 42</p> <p>1 Q. Did you ever have any contact with any 2 specific person at the Department of Public Welfare or 3 Department of Education with regard to any employee's 4 behavior?</p> <p>5 A. I have to say I don't know.</p> <p>6 Q. Okay. Let's go on to the third subject to be 7 discussed as listed on the deposition notice: "Any 8 facts or information indicating that Eric Romig 9 attempted to induce, entice, persuade, convince or 10 coerce any female student to engage in any form of 11 inappropriate or explicit sexual activity."</p> <p>12 From your own answers that you've already 13 given me to other questions, can I assume that there 14 were no such facts or information of which you were 15 ever made aware personally?</p> <p>16 A. That is correct.</p> <p>17 Q. And if a complaint or allegation had been made 18 about that type of behavior, it would have to go 19 through you?</p> <p>20 A. That is correct.</p> <p>21 Q. Okay. So, even if somebody that you 22 supervised got the information, they would still have 23 to come to you and you would be aware of it.</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 44</p> <p>1 health issues or problems experienced by Eric Romig 2 during his employment by Quakertown."</p> <p>3 Other than the facts that he gave to 4 Quakertown in his resignation that I think I already 5 showed you previously in the deposition, are you aware 6 of any other details concerning that health issue or 7 any other health issues that Mr. Romig may have been 8 experiencing while he was an employee of Quakertown?</p> <p>9 A. No.</p> <p>10 Q. Number six is the last topic, and it's "Any 11 facts and information, as well as any rumors, 12 suspicions or accusations regarding an inappropriate 13 personal relationship between Eric Romig and Alicia 14 Hughes, and/or any other female student or athlete at 15 Quakertown."</p> <p>16 Based upon your review of records or your 17 attempting to find information on this particular 18 topic, did you find anything that could provide some 19 facts on that subject?</p> <p>20 A. No.</p> <p>21 Q. I just want to look at some of the documents 22 that you did provide me so I know what I'm looking 23 at -- make sure I know what I'm looking at.</p> <p>24 The first sort of half of the documents that</p>
<p style="text-align: right;">Page 43</p> <p>1 Q. Subject number four is "Any concerns, 2 problems, complaints or issues regarding Eric Romig's 3 coaching activities at Quakertown between 2007 and 4 2010, inclusive."</p> <p>5 That topic is not limited to just sexual 6 harassment or abuse or that type of thing, but any type 7 of employment-related problem: Complaint by a student, 8 by a parent, by a coworker, anything of that nature at 9 all.</p> <p>10 Did you do anything to find out if that ever 11 occurred?</p> <p>12 A. Nothing was reported to me regarding his 13 employment. Lower-level concerns about how he coached 14 the team or things like that would have been reported 15 to the athletic director, who was no longer employed by 16 Quakertown.</p> <p>17 Q. Do you recall at any time when Mr. Babb was 18 the athletic director and supervisor of Mr. Romig 19 whether or not Mr. Babb came to you with any issues, 20 problems, concerns, complaints, whatever, about Mr. 21 Romig's performance as a coach or his behavior toward 22 any of his players?</p> <p>23 A. No, he did not.</p> <p>24 Q. Number five is "Any information regarding any</p>	<p style="text-align: right;">Page 45</p> <p>1 were provided all give the names of employees and what 2 their -- I'm sorry, all give the names of what looks 3 like extracurricular activities, people involved in 4 extracurricular activities for Quakertown.</p> <p>5 Let me just ask you to look at these pages 6 right here first and just generally describe what they 7 are for me.</p> <p>8 A. Yes, this is the extra-duty placement guide, 9 which is a list of all co-curricular positions and who 10 is recommended by the principal to fill them and the 11 pay rate associated with them.</p> <p>12 Q. And we'll get to the application, I think, 13 that Mr. Romig made to Quakertown in a second, but 14 would the process back then have been that the athletic 15 director made a recommendation to the principal to hire 16 a particular coach?</p> <p>17 A. It would have been a combination of the 18 athletic director and the principal, generally 19 speaking.</p> <p>20 Q. And who gets the say in whether or not 21 somebody gets hired?</p> <p>22 A. Final say would probably belong to the 23 principal.</p> <p>24 Q. Does the principal have to get the okay or</p>

Nancianne Edwards

Nace vs. FCA, et al.

May 19, 2015

<p style="text-align: right;">Page 46</p> <p>1 authorization from the board or superintendent or 2 assistant superintendent?</p> <p>3 A. Well, the school board approves all hiring.</p> <p>4 Q. Okay. And there is a page, page three, for 5 the 2007/2008 school year that lists Mr. Romig as the 6 head coach of the senior high girls softball team at a 7 salary -- it doesn't give the salary.</p> <p>8 Am I reading that correctly? I put a red 9 asterisk down at the bottom of the page. That's the 10 indication that he was hired as a coach that year for 11 the girls softball?</p> <p>12 A. Yes, and the rate of pay would have been one 13 of these three rates, depending on whether he had -- if 14 he had one year of service, the rate of pay would have 15 been \$3,135.38.</p> <p>16 Q. Was there an actual contract that was signed 17 by Mr. Romig for his employment as a coach?</p> <p>18 A. I don't believe so.</p> <p>19 Q. And by "contract," I'm talking about a written 20 document signed by both parties that says you are 21 employed in a certain position from a certain date to 22 another certain date at a pay rate of X amount of 23 dollars.</p> <p>24 A. All employees after board approval receive a</p>	<p style="text-align: right;">Page 48</p> <p>1 A. Yes.</p> <p>2 Q. It looks like -- and I can't tell from this 3 document. I assume it's a forwarding of an email from 4 Mr. Romig to Ms. Kalazs, or is it just --</p> <p>5 A. No, it looks like Ms. Kalazs forwarded the 6 email from Mr. Romig to Ms. Hrabina, whose job it was 7 to process the resignation.</p> <p>8 Q. Okay. In that resignation memo, Mr. Romig 9 says "If you would like an official letter or 10 resignation, I can do that for you."</p> <p>11 Do you know if Quakertown ever got anything 12 more from him than this document?</p> <p>13 A. No. It would be in the file if he had 14 submitted something else.</p> <p>15 Q. That was dated January 5th, 2010. There is a 16 letter from you to Mr. Romig on Quakertown Community 17 School District stationery dated January 15th, ten days 18 later, notifying Mr. Romig that his resignation had 19 been approved by the Quakertown Community School 20 District Board of School Directors at its meeting on 21 January 14th, 2010.</p> <p>22 The 2010 season, the spring season 2010, had 23 not taken place yet. Do you know if he was paid 24 anything prior to the beginning of that season?</p>
<p style="text-align: right;">Page 47</p> <p>1 letter confirming that the board has approved their 2 appointment to such-and-such a position. I do not 3 recall whether at that time period we did those letters 4 for unit-pay positions or not.</p> <p>5 Q. I'm sorry, I missed that last part. Unit-pay 6 positions?</p> <p>7 A. That's what those are, extracurricular.</p> <p>8 Q. There is another document in that group of 9 documents for the school year 2008/2009. At the bottom 10 it says page three. That also shows Eric Romig again 11 being hired as a girls softball coach for that school 12 year. Is that correct?</p> <p>13 A. Yes.</p> <p>14 Q. And that really would have been, since it's a 15 spring sport, we're talking about 2009.</p> <p>16 A. Yes.</p> <p>17 Q. There is a document from Sylvia Kalazs sent on 18 January 5th, 2010 to Gloria Hrabina regarding Mr. 19 Romig's resignation.</p> <p>20 A. Uh-uh.</p> <p>21 Q. First of all, who is Gloria Hrabina?</p> <p>22 A. She was the human resources assistant at that 23 time.</p> <p>24 Q. Your assistant.</p>	<p style="text-align: right;">Page 49</p> <p>1 A. I don't have any personal knowledge of that, 2 but I do not believe that he would have been paid at 3 that point in the year for any portion of coaching for 4 a spring sport.</p> <p>5 Q. Can you tell me generally when a coach that 6 coaches a spring sport gets paid?</p> <p>7 A. They get paid, I believe, in unit pays three 8 and four, which are later in the winter as the spring 9 season is starting, and then I believe the last one is 10 in May.</p> <p>11 Q. A final payment in May?</p> <p>12 A. Yes.</p> <p>13 Q. At the end of the season.</p> <p>14 A. Something like that, yes.</p> <p>15 Q. There is a document entitled "Quakertown 16 Community School District Unit Pay Change Form." It 17 gives the name of Eric Romig as "employee resigning" 18 and under "position posting" it says "Yes, posted."</p> <p>19 Is this simply an authorization on the day 20 after you sent your letter to Mr. Romig confirming that 21 his position is now being posted for a new coach of the 22 girls softball team?</p> <p>23 A. Well, this would not go to him. This would be 24 our internal tracking sheet that would confirm that he</p>

Nancianne Edwards

Nace vs. FCA, et al.

May 19, 2015

Page 50

1 resigned and authorized the posting for a replacement.
 2 Q. Okay. There is another document -- actually,
 3 the same resignation memo that was emailed to Sylvia
 4 Kalazs from Eric Romig on January 5th, 2010. The
 5 subject of that email is listed as "college athletes."
 6 I don't know if you took any notice of that before.

7 Do you have any idea -- and I don't want you
 8 to guess what's in his head -- do you have any idea of
 9 what that refers to?

10 A. No, I don't.

11 Q. In that email to Ms. Kalazs Mr. Romig says
 12 "Let me know what you need from me" in his final
 13 sentence.

14 Do you know whether or not anything further
 15 was requested from him before you accepted his
 16 resignation?

17 A. I don't believe so. It would not have been
 18 customary to request any additional information.

19 Q. I guess as a point of interest: Why does the
 20 school board have to approve a resignation? Is there
 21 something they can do to not approve a resignation?

22 MR. GARTON: It's a statutory thing.

23 MR. GROTH: Oh, okay.

24 BY MR. GROTH:

Page 50

1 A. At that time, then, we must have only done
 2 those two.
 3 Q. There is another document headed "Quakertown
 4 Community School District Extracurricular Activity." Is
 5 this the -- I'm sorry, "Extracurricular Application." I
 6 think I said "Activity." It's "Extracurricular
 7 Application."

8 Is this, for lack of a better term, formal
 9 application for a position as a coach that Quakertown
 10 used at the time?

11 A. Yes.

12 Q. That application has a space for the applicant
 13 to provide information regarding prior coaching or
 14 activity supervising experience, and Mr. Romig lists
 15 Faith Christian Academy as a place where he coached
 16 both baseball for five years and basketball for three
 17 years. If you look at paragraph three.

18 A. Yes, I just saw it.

19 Q. Okay. At the time that this application was
 20 made back in 2007, did Quakertown do anything to
 21 contact former employers or organizations that hired
 22 somebody such as Mr. Romig to be a coach to question
 23 them about his performance of his job at a prior
 24 location?

Page 51

1 Q. There is a letter in Mr. Romig's personnel
 2 file dated March 27, 2008, from you confirming his
 3 appointment as head softball coach for the 2007/2008
 4 school year at a rate of pay of \$3,073.90.

5 It says, "Please indicate receipt of this
 6 letter by signing the attached copy and returning it to
 7 the human resources office at your earliest
 8 convenience."

9 I take it that's Mr. Romig's signature down at
 10 the bottom left-hand corner?

11 A. I assume so.

12 Q. That's where it would be signed by the
 13 applicant?

14 A. Yes.

15 Q. It says, "Also attached are some board
 16 policies and regulations distributed to all employees.
 17 Please read over this information and keep for your
 18 files."

19 Is that the information we talked about before
 20 about drug-free policy and harassment policy?

21 A. Yes.

22 Q. Are there any other policies that are given to
 23 the employee besides those two? Because we only have
 24 acknowledgments for two.

Page 53

1 A. It is a required part of the process for
 2 hiring, but I do not know for sure if it was done in
 3 this particular case.

4 Q. If it was at this time a required part of the
 5 process, would the contact made by some representative
 6 of Quakertown to some former employer of this applicant
 7 be memorialized in some kind of writing?

8 A. Not necessarily.

9 Q. And who would be the person back in 2007 that
 10 would have been responsible for making that contact for
 11 a hire such as Mr. Romig?

12 A. Either the athletic director or the high
 13 school principal.

14 Q. So, it would have been Mr. Babb or whoever the
 15 principal was at that time?

16 A. Yes.

17 Q. Are they supposed to document that type of
 18 background check? I mean in writing, document it in
 19 writing, to put in someone else's file.

20 A. Not for coaching.

21 Q. For teachers?

22 A. Yes, that's generally documented. Now it's
 23 all electronic, so we don't have any paper any more.

24 Q. Do you know whether or not Mr. Babb knew Mr.

14 (Pages 50 to 53)

Appendix1022

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Nancianne Edwards

Nace vs. FCA, et al.

May 19, 2015

<p>1 Romig prior to hiring him or being part of the hiring 2 process for Mr. Romig's tenure at Quakertown? 3 A. I don't know. 4 Q. Do you know whether or not Mr. Babb had any 5 connection at all at the time he was working for 6 Quakertown with Faith Christian Academy? 7 A. I don't know. 8 Q. As a member or a coach or any affiliation at 9 all. 10 A. I don't know. 11 Q. There are also a number of criminal checks 12 that appear to have been completed and made part of Mr. 13 Romig's personnel file at the time, including one by 14 the Pennsylvania State Police, one by the Department of 15 Public Welfare, and one by -- looks like the FBI? 16 Was that the general practice back then for 17 employee checks before hiring? 18 A. Yes, the three required clearances. Yes. 19 Q. I think you said those were the three 20 requirements? 21 A. Those are the -- there are three clearances 22 required for school employment. 23 Q. When you say "require," do you mean required 24 by law?</p>	Page 54	<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> <p>MR. SANTARONE: I don't have any questions. MS. OLSZEWSKI: No questions. MR. FOX: No questions. MS. CONNOR: No questions. MR. GARTON: No questions. MR. GROTH: The deposition is completed. Thank you very much. THE WITNESS: You're welcome. MR. GROTH: I appreciate it. (The deposition was concluded at 4:30 p.m.)</p>
<p>1 A. Yes. 2 Q. Was there any reason back in 2007, 8 or 9 3 where you would not get these clearances from a 4 prospective employee? 5 A. No. 6 Q. It's mandatory. 7 A. That is correct: No one starts work without 8 them. 9 Q. And the last document in the pack is a letter 10 from you dated November 12th, 2009 to Mr. Romig, 11 confirming his approval by the school district of his 12 position as head girls softball coach for the 2009/2010 13 school year. That would have been for the third year 14 that he was coaching. He's already completed 2008 and 15 2009 by that time. 16 A. Yes, I believe that's what the record 17 reflects. 18 Q. But since he turned in his resignation January 19 5th, 2010, he didn't coach at any part of that year, 20 2010. 21 A. Correct. 22 MR. GROTH: I have no further 23 questions. Thank you very much. Some of the 24 other attorneys may have questions for you.</p>	Page 55	<p>1</p> <p>Notice of Deposition</p> <p>Page 57</p> <p>10</p>

15 (Pages 54 to 57)

Appendix1023

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Nancianne Edwards

May 19, 2015

Nace vs. FCA, et al.

Page 58

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I FURTHER CERTIFY that I am neither attorney nor counsel for, not related to nor employed by any of the parties to the action in which this deposition was taken; and further certify that I am not a relative or employee of any attorney or counsel employed in this action, nor am I financially interested in this case.

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7 contained fully and accurately in the stenographic
8 notes taken by me and that the copy is a true and
9 correct transcript of the same.

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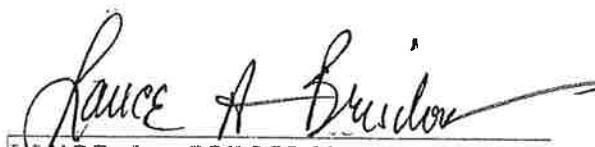
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Nancianne Edwards

May 19, 2015

Nace vs. FCA, et al.

Page 1

A	acknowle...	29:22	29:10	approve	31:17	42:15,23	7:1,6,8,15	16:3
abide 8:9	26:9,20	34:21	46:22	50:20,21	34:12	44:5	7:16	17:12,19
ability 7:24	acknowle...	40:10	47:8 50:2	approved	36:2	awfully	20:18	21:10
about 4:21	22:19	46:24	52:3	1:15 25:5	43:15,18	33:8	21:2 25:6	34:3 43:3
4:23 6:18	acknowle...	49:20	answer	47:1	45:14,18	a.m 20:15	28:2,10	44:13
9:4,4,9,14	22:23	afternoon	6:21 7:1	48:19	53:12		30:8	beyond
10:21	acknowle...	4:10	7:2,7,9,14	approves	attached		33:22	18:20
12:10	22:15	afterwards	7:16,18	46:3	5:24 10:6	Babb 15:18	39:10,12	26:22
17:7 19:1	26:23	35:20	8:4,5,9,10	approxim...	10:12	15:24	39:17,22	27:1
22:20	acknowle...	again 17:20	9:6,12,13	32:4	34:8	16:17	50:6,15	33:23
23:8 26:1	22:7	32:8	9:15	April 5:7	36:13	17:11,13	51:19	bit 9:5
27:10,16	51:24	47:10	answers	10:5	51:6,15	20:6,6	54:17	board 46:1
28:2 31:7	action 1:4	against	7:12	22:14	attempt	34:9,10	58:7	46:3,24
33:6	58:10,13	29:5 38:3	42:12	archived	34:9	34:16	began 21:4	47:1
35:14,18	activities	40:18	anybody	33:14	attempted	36:1	begin 7:6,9	48:20
36:9,20	5:13	agency	13:22	archives	42:9	43:17,19	7:15,16	50:20
38:18	27:12	32:24	27:13	33:24	attempting	53:14,24	beginning	51:15
39:4 41:6	30:10	35:11	33:4	arrangem...	44:17	54:4	1:12	both 40:5,6
42:18	43:3 45:3	ago 28:4	anything	9:20	attempts	back 4:19	15:11	40:7
43:13,20	45:4	agreed 4:1	4:21 19:8	arrested	34:21	5:4,7 7:5	48:24	46:20
46:19	activity	ahead 8:10	19:10	32:9	37:8	9:14,21	BEGLEY	52:16
47:15	23:3	al 1:4,6	21:11	asked 5:1	attended	11:23	1:11 2:8	bottom
51:19,20	40:22	Alicia	22:3	17:8 19:4	30:13	21:16	behavior	46:9 47:9
52:23	42:11	30:13	26:13,17	asking 5:15	attention	25:9,18	37:2,4	51:10
above 1:13	52:4,6,14	31:2,6	27:21	7:8 16:22	30:7	38:2,4	41:18	Boulevard
abuse 4:17	actual	44:13	43:8,10	33:5	attorney	39:19	42:4,18	1:11 2:9
30:4	35:19	allegation	44:18	aspects	7:24 8:1	40:17	43:21	Box 2:20
39:24	46:16	38:3,5,7	48:11,24	11:17	8:8 9:19	41:23	being 47:11	break 9:18
43:6	actually	38:21	50:14	assistant	29:4,21	45:14	49:21	9:20
Academy	14:4	39:20,24	52:20	11:2	29:22	52:20	54:1	briefly
2:17 19:1	24:17	40:18	appear	12:23	58:9,12	53:9	believe 12:6	11:14
52:15	25:14	41:3,6	54:12	29:4,21	attorneys	54:16	16:7 18:1	brought
54:6	26:14,18	42:17	APPEAR...	46:2	8:7 36:22	55:2	20:10,23	39:20
accept	27:3	allegations	2:1 3:3	47:22,24	55:24	background...	21:9 31:1	brusilow
35:23	32:20	37:1	applicant	Attorney's	53:18	32:22	1:14,18	
accepted	39:16	alleged	51:13	associated	27:14	bargaining	34:10	58:3,15
50:15	50:2	38:12	52:12	associates	28:15	38:14	35:19	Bucks 25:1
according	addition	allow 8:3	53:6	1:18	authoriza...	baseball	38:19	25:2
12:22	33:23	already	application	assume 7:3	46:1	52:16	40:7	27:14,14
15:10	additional	20:23	16:14	21:17	49:19	based 5:6	46:18	28:16
account	29:15	42:12	45:12	32:2	authorized	30:3	49:2,7,9	29:10,21
27:9	50:18	44:4	52:5,7,9	42:13	50:1	44:16	50:17	29:22
accurate	address	55:14	52:12,19	48:3	available	basically	55:16	30:8 31:6
58:5	17:2 26:4	among 4:1	applicati...	51:11	9:2	bell 29:6,11	bellong	bulk 34:12
accusation	addressing	amount	14:7	asterisk	23:2	belong		
37:15,24	41:17	46:22	apply 58:20	46:9	36:21			
38:3,5	administr...	and/or	appointm...	22:10	40:1	C		
39:6,21	34:4 40:2	13:13	47:2 51:3	athlete	45:22	call 14:24		
39:23	affiliation	36:17	44:14	26:2,12	benefits	called		
41:3,6	54:8	37:3	appreciate	26:24	basketball			
accusations	after 5:2	44:14	56:10	27:8,9,10	11:20			
37:1	16:20	58:21	37:5 50:5	27:18	besides	14:24		
44:12	17:11	Anita 36:10	appropri...	28:20	52:16	25:14		
acknowle...	18:13	another	38:20	30:11	became	came 43:19		
22:3,4	20:7	18:24	15:15	32:5,14	32:17	capacity		
25:21	22:16	20:7	20:24	32:16,17	32:21	11:8		
		55:11	21:5	32:18,21	before 1:13	30:17		
			40:8	6:2,4,21	11:23	CARLA		
					15:10	3:8		

Appendix1026

Nancianne Edwards

Nace vs. FCA, et al.

May 19, 2015

Page 2

2:21	50:5,11	employm...	15:13,14	28:21	40:18	43:24	50:15	22:1,2,22
Drive 33:21	emailed	5:13	evaluations	expect 6:14	42:10	52:16	51:2 55:3	23:4,17
drug 21:23	50:3	13:13,13	11:21	expecting	44:14	follow 27:5	55:10	24:8
drug-free	employed	13:18,24	12:1,14	25:2	file 14:2,8	followed	front 23:11	25:14
21:23	5:14	14:8,17	13:13	experience	14:10,22	33:15	fully 7:23	26:15,19
22:15	10:22	17:9,22	14:6 15:3	52:14	14:22,24	35:20	further	36:1
51:20	11:5 13:2	19:6,20	19:9 36:1	experienc...	15:1,2,6	following	50:14	42:13
due 18:2	13:18	27:16,20	36:17	44:1	16:8,11	34:18	55:22	51:22
duly 4:7	19:7 20:2	30:10	even 9:2,3	experienc...	16:13,23	follows 4:7	58:8,11	gives 49:17
58:6	21:11	32:6 33:2	41:3	44:8	20:19	follow-up	giving 7:4	
during 10:7	30:5,24	34:1,5	42:21	explained	22:5,6	27:2	G	18:8
11:16	43:15	36:1,8,16	events 7:4	25:15	28:6,8,9	foregoing	gap 17:12	24:11
15:8	46:21	36:16	eventually	explanati...	28:11,21	58:5,19	Garton 2:8	Gloria
19:14	58:9,13	37:13	15:24	7:19	29:17	form 4:4	5:6,15,21	47:18,21
21:20	employee	43:13	ever 6:3	explicit	33:5,13	15:4	8:4 10:14	go 6:2,11
31:14	5:16	44:2	13:17,23	41:7	33:24	28:23	10:18	6:13,16
34:12	11:20,21	46:17	18:5	42:11	34:2	42:10	12:23	8:10
36:2	12:1 15:3	54:22	19:13	extent 18:3	37:18,20	49:16	14:4,23	15:24
37:12	15:19	employm...	20:11	extracurr...	37:22,23	formal 12:6	16:12,24	16:3,20
44:2	21:19	43:7	21:9 26:7	45:3,4	37:23	12:7,14	36:22	24:21
duties	22:22	encompas...	27:2 30:1	47:7 52:4	48:13	13:17	50:22	36:12
11:14	23:17	23:2	30:7 31:2	52:5,6	51:2	15:3,13	56:6	42:6,18
	26:11,14	end 11:23	31:5	extra-duty	53:19	24:3 52:8	gave 18:9	49:23
E	26:15	21:6	34:23,24	45:8	54:13	former	44:3	GOGGIN
E 3:8	27:2	49:13	35:5,10		files 28:22	30:9	general	2:13
each 7:13	30:16	engage	42:1,15	F	51:18	52:21	16:21	going 5:4
earliest	32:19	40:21	43:10	fact 8:17	filin 4:3	53:6	54:16	6:11,17
51:7	33:12,13	42:10	48:11	20:21	fill 45:10	forth 58:7	generally	7:5 8:10
East 2:20	38:3,15	engaged	every 7:23	28:14	final 34:20	forward	23:7	8:14 9:14
3:9,20	38:20	30:4	22:22	33:11	45:22	5:7	27:10	26:22
EASTBU...	39:20,23	enough 5:7	24:9	facts 5:2	49:11	forwarded	31:23	Good 4:10
2:19	40:1,3,19	entice 42:9	31:20	6:18 7:4	50:12	48:5	32:14	grade 30:19
Eastern 1:1	40:22	entitled	everyone	8:15 9:9	financially	forwarding	38:6 45:6	30:19
4:12	41:1,8	49:15	40:13	9:9,10	58:13	48:3	45:18	grade-de...
Education	44:8	Eric 4:15	exactly	42:8,14	find 14:5	founded	49:5	30:22
25:6 42:3	49:17	13:12	4:23 7:8	44:3,11	16:9 31:5	39:1	53:22	GRAY 2:19
Edwards	51:23	17:9	25:15	44:19	43:10	four 43:1	gestures	GRIMES
1:10 4:6	54:17	20:14	32:15	failure	44:17,18	49:8	7:21	3:18
4:10	55:4	36:15	38:11	35:14	finish 9:21	FOX 56:4	53:22	Groth 2:3
effect 30:2	58:12	37:1 42:8	EXAMIN...	fairly 6:10	firing 11:18	from 8:16	45:21	4:9,11
either 7:18	employees	43:2 44:1	4:8	Faith 2:17	first 4:6 6:3	8:22 9:2	49:6	5:19,22
18:7	17:1	44:13	examined	19:1	6:19	18:15	girls 15:9	10:3,19
53:12	19:19	47:10	4:7	52:15	10:22	20:14	21:12,15	10:20
electronic	22:2 24:8	49:17	example	54:6	19:5 23:9	27:13,24	31:13	15:23
10:13	25:13	50:4	12:16	familiar	30:19	28:15	46:6,11	50:23,24
24:20,21	29:20	ESQUIRE	40:9	6:10	32:4,21	31:5	47:11	55:22
53:23	41:19	2:3,8,14	except 4:3	23:19,22	32:22	32:23	49:22	56:7,10
Elizabeth	45:1	2:19 3:8	exchanged	24:4	35:9	33:24	55:12	group 47:8
4:17,24	46:24	3:19	37:7	30:12	36:15	37:15	give 6:21	guess 50:8
27:12	51:16	established	exhibit 5:9	FBI 54:15	44:24	41:1	7:1,2,17	50:19
29:5	employee's	37:24	10:1,4,10	FCA 3:14	45:6	42:12	20:17	guide 45:8
else's 53:19	42:3	et 1:4,6	10:11	felonies	47:21	46:1,21	32:8 45:1	guilty 4:16
email 15:4	53:6	12:4 36:4	13:12	4:16	58:6	47:17	45:2 46:7	32:10
18:15	20:14	employer	evaluated	37:7,15	firsthand	48:2,3,6	given 6:3,5	
20:14	employers	12:4 36:4	36:14	38:4	38:16	48:12,16	13:23	
48:3,6	52:21	13:18,24	existed	38:4	50:4,9	50:4,12	21:21	half 32:11

Nancianne Edwards

Nace vs. FCA, et al.

May 19, 2015

Page 4

44:24	21:2,9	23:23	15:13	27:11	35:17	35:1 42:5	left-hand	long 6:15
handle 12:1	26:7 35:8	47:22	informati...	30:3	36:12	44:22,23	51:10	11:3
handled	35:14,16	51:7	5:12 8:15	38:24	37:16	48:11,23	let 6:2,13	24:24
29:4	35:16,17		8:23 9:2	39:12,18	38:5 39:4	50:6,12	7:6,14,15	30:24
handout	35:18	<u>I</u>	9:8 10:21	41:2	39:17	50:14	9:19	33:8
26:3	36:4	idea 50:7,8	12:21	investigat...	43:5	53:2,24	10:10,21	longer
harassment	37:16	identifica...	17:2,8	40:15	44:21	54:3,4,7	36:12	43:15
21:22	48:12	10:2	18:14	involved	45:5,6	54:10	39:4 45:5	look 13:22
22:11	49:23	immediate	29:15	45:3	48:4	knowledge	50:12	16:10,22
23:1,8,9	50:15	39:5	30:1	involving	52:18	8:22 9:3	letter 15:5	20:17
25:15,16	54:1	immediat...	32:12	4:15		12:12	18:14	33:5
26:10	hire 16:7	17:11	34:7	issue 6:8		13:16	47:1 48:9	44:21
30:5 43:6	24:11	38:23	36:20	44:6	Kalazs 17:6	18:4,20	48:16	45:5
51:20	45:15	important	37:9	issues 6:18	17:13,22	19:6	49:20	52:17
hard 7:12	53:11	6:18 22:8	39:15	8:19 17:7	18:22	29:18	51:1,6	looked 26:9
Harner	hired 16:6	inapprop...	42:8,14	18:8 26:4	19:17	38:17	55:9	32:2
20:1	21:19,20	37:4,5	42:22	36:20	20:8,10	40:13,14	letters 35:8	looking
having 4:6	22:1	40:19	43:24	43:2,19	20:14	41:22,24	35:14,17	8:14
head 7:19	34:11	42:11	44:11,17	44:1,7	47:17	49:1	47:3	20:12
26:4	45:21	44:12	50:18	Item 36:24	48:4,5	known 9:13	Let's 42:6	44:22,23
40:23	46:10	include	51:17,19	IU 25:1	50:4,11		level 38:20	looks 45:2
46:6 50:8	47:11	11:21	52:13	keep 15:20		<u>L</u>	like 27:21	48:2,5
51:3	52:21	23:9	informs	<u>J</u>	23:17	labor 11:19	30:19	54:15
55:12	hiring	24:11	20:15	J 2:14	51:17	lack 52:8	33:9	Lower-le...
headed	11:18	included	initial	JAMES 1:4	KELLY	lady 4:18	43:14	43:13
52:3	13:12	14:1,11	39:12,15	January	3:18	Lance 1:13	45:3 48:2	<u>M</u>
health 18:3	16:15,18	including	inquiries	5:5 20:14	Kemmemer	58:3,15	48:5,9	M 2:19
18:7,11	19:9	12:24	27:19	32:10	29:10	Langhorne	49:14	made 14:22
44:1,6,7	24:14	25:16	35:5,7	47:18	kept 15:6	1:12 2:10	54:15	
held 1:10	36:16	37:2	instructed	48:15,17	33:18	language	likely 16:8	22:10
11:3	46:3 53:2	54:13	8:8	48:21	kind 5:7	37:6	26:6	26:2,11
help 6:14	54:1,1,17	inclusive	instruction	50:4	18:15	last 6:15	37:3	26:23
helpful	history	43:4	8:9	55:18	23:3 32:8	34:15,21	43:5	28:3
6:16	5:13 19:6	indicate	instructio...	JEFFREY	35:9	44:10	line 32:9	29:19
her 17:7,8	27:16,20	13:23	6:16 9:22	2:8	40:21	47:5 49:9	list 10:6,12	34:21
18:1,2,3	33:2 34:1	20:20	instructs	Jennifer	53:7	55:9	31:12	38:3,3,22
18:15	34:5	31:18	8:5	29:6	knew 16:17	late 4:19	36:12	38:23
19:1	hold 17:16	51:5	interest	jgarton@...	53:24	later 48:18	45:9	40:18
20:15	Hollenbach	indicates	50:19	2:11	know 7:8	49:8	listed 8:19	41:7,8,18
30:15	3:14,24	26:21	interested	jjsantaro...	8:15 9:6	law 23:20	13:11	42:15,17
31:1,7	HORNST...	indicating	58:14	2:16	9:8,11,19	24:2,4	17:2 42:7	45:13,15
high 5:3,14	2:2,2	18:15	internal	job 14:7	12:3,4,14	25:7 39:2	50:5	52:20
12:16	hours 24:9	42:8	33:1,24	37:2 48:6	12:18,19	40:8	listen 6:20	53:5
15:9	HR 26:3	indication	49:24	52:23	12:20,21	54:24	lists 46:5	54:12
27:13	40:23	46:10	interview	JOSEPH	13:10	lawsuit	52:14	make 6:19
31:13	Hrabina	individual	38:8	2:14	15:11	4:11	litigation	6:20 7:20
36:5,11	47:18,21	2:23 4:15	interview...	July 11:4	16:4,5,17	learned	4:14	8:7 9:19
46:6	48:6	12:20	30:8	11:12	16:19	8:16	little 9:5	26:14,17
53:12	Hughes	individuals	interview...	just 6:13	18:5,13	39:23	10:21	37:8
him 5:15	30:13	36:8	38:12,13	8:2 9:13	18:16	learning	LLP 1:11	38:24
18:1,1,4,4	31:3,6	induce	38:17	10:21	21:18	5:3 32:12	2:8	39:15
18:6,6,15	44:14	40:21	investigate	11:14	28:9,14	least 38:24	local 4:22	44:23
18:17	human 11:9	42:9	38:5 40:2	18:21	29:14,19	39:14	located	making
19:10,11	11:15,17	informal	investigat...	22:20	30:15	left 15:24	14:21	7:11
19:12,13	14:9,16	12:10,14	29:9	26:9,10	31:15,19	17:11,13	location	27:19
20:11	22:12	13:18	investigat...	32:8	32:3 33:6	20:7	52:24	39:1

Nancianne Edwards

May 19, 2015

Nace vs. FCA, et al.

Page 5

53:10	medium	29:6	34:9 35:9	okay 6:7	24:19	53:23	47:3	photos
male 40:18		Naces 4:11	35:9	8:14 9:18	25:12	paragraph	person	31:24,24
Mall 1:12	meet 25:6	Nace's 4:18	36:13	10:19	28:1	52:17	10:14,15	37:6
2:9	meeting	4:24	42:7 50:6	17:20	29:16	parent 43:8	14:3,4	physical
managem...	48:20	name 4:10	57:1	19:4 21:8	31:17	part 5:10	15:12	37:5 41:4
11:20	member	4:18 5:18	notification	22:18	32:24	8:17,21	16:6	pictures
manager	54:8	5:20 29:6	22:9	26:1 28:1	33:4 34:3	34:7 47:5	17:16	31:23
14:9,14	members	37:20	33:16	42:6,21	37:23	53:1,4	18:7 26:3	PIETRA...
14:15	31:13,18	49:17	41:11	45:24	38:16	54:1,12	28:5	3:18
mandatory	32:1	named 4:15	notified	46:4 48:8	42:13	55:19	34:10,11	PITCH...
55:6	memo 48:8	29:11	18:2	50:2,23	44:3,6,7	particular	37:11	3:7
MANDIO	50:3	30:13	notifying	52:19	44:14	44:17	38:12,13	place 4:19
1:11 2:8	memorial...	names	19:21	OLSZE...	51:22	45:16	41:15,20	16:3 21:3
March 51:2	53:7	29:11	39:5	3:19	55:24	53:3	42:2 53:9	24:24
marked 5:9	memory	38:15	48:18	15:20	others 8:16	parties	personal	40:16
10:1,4	23:5	45:1,2	November	56:3	otherwise	46:20	8:22 9:3	48:23
36:13	met 18:1	NANCIA...	55:10	once 24:9	6:6	58:10	12:12	52:15
Market	method	1:10 4:6	number	33:15	out 8:22,23	party 8:23	13:16	58:7
2:14	12:11	narrative	4:16 5:9	one 6:9 7:7	14:5 22:1	pay 45:11	19:5,11	placement
MARSH...	Middleto...	7:18	7:7,9	7:10 10:4	31:5 33:4	46:12,14	19:12	45:8
2:13	1:11 2:9	nature	12:22	10:11	43:10	46:22	35:15	Plaintiffs
material	might	19:10	36:14,24	13:11,12	over 6:16	49:16	44:13	2:6
22:22	12:19	40:20	43:1,24	16:9,16	7:13	51:4	49:1	players
23:1,3	38:16	43:8	44:10	22:7 27:1	14:20	paying	personally	43:22
26:15,18	Mike 13:1	necessarily	54:11	33:22	16:11	19:10	8:15 9:12	pledaded
materials	13:6	53:8		36:14	21:2	payment	27:18	4:16
21:21	misconduct	need 9:18	O	41:19	29:14	49:11	28:8	please 7:15
25:20	38:8,13	9:20	objection	46:12,14	35:10	pays 49:7	42:15	7:23 9:7
math 13:8	38:17	50:12	8:2,3	49:9	36:8	PELLONI	personnel	9:19
matter 4:14	missed 47:5	needed	objections	54:13,14	51:17	2:2	14:2,10	22:12
matters	module	39:16	4:3 8:6	54:15	overpaid	pending	15:2,6	51:5,17
10:8	24:7,16	neither	objects	55:7	34:20	4:12 41:2	16:8,11	pled 32:10
may 1:8 5:9	24:20	58:8	7:24 8:1	ones 13:5	35:15	Pennridge	16:23	point 27:11
6:15 8:6	25:1,10	never 32:2	obligated	only 7:10	overpay...	1:6 2:23	22:4	49:3
8:7,15,16	momenta...	new 7:15	9:7	8:21 18:1	35:19	2:24 16:1	27:20,24	50:19
9:12 10:8	25:3	21:19	obligation	51:23	overseeing	16:4 27:7	28:6	Police
17:15	money 35:1	24:11	8:21	52:1	23:23	27:13	29:16	54:14
30:4 33:6	months	31:9	25:23	opportun...	own 8:8	32:6	33:5,13	policies
33:6	34:17	49:21	obtain	16:10	42:12	35:24	33:23	22:2
36:11	more 16:21	news 27:9	16:23	opposed	Oxford	33:2	23:13	26:2
44:7	48:12	newspape...	37:8	40:2	1:12 2:9	Pennsylv...	34:2	51:16,22
49:10,11	53:23	4:22	occurred	Oral 1:10	25:5	policy	36:21	51:22
55:24	most 15:18	next 17:14	32:14	order 17:1	54:14	51:1	37:22	51:21,23
maybe	16:8 26:6	17:16,16	38:19	organizat...	P 2:8	people 7:13	54:13	22:11,16
10:14	much 35:1	20:9	43:11	52:21	PA 1:20 2:4	12:15	persuade	23:1,2,5,8
mean 19:8	55:23	22:16	October	other 6:8	2:10,15	13:2	40:21	25:16,20
24:6	56:8	none 37:12	32:9	7:13 8:1	2:21 3:11	38:16,18	42:9	26:5,10
25:13	must 22:9	Notary	off 36:11	8:7 9:2	3:21	45:3	ph 2:5,10	26:12
53:18	28:20	1:14 58:4	office 27:14	12:2,11	pack 55:9	performa...	2:16,21	27:3
54:23	52:1	Nothing	28:7,15	15:5	page 46:4,4	11:19	3:12,22	51:20,20
means		43:12	28:16	16:16,22	46:9	37:2	Philadelp...	49:3
58:20	N	notice 5:15	41:15	17:1	47:10	43:21	1:20 2:4	portion
media 3:21	N 3:19	6:1 8:20	51:7	18:10,18	pages 45:5	52:23	2:15 4:13	position
27:6,6,6	Nace 1:4	10:5,6,17	official 48:9	19:16,18	paid 48:23	period 5:4	phone 18:7	49:3
30:2	4:18	17:3	Oh 28:1	19:21,22	49:2,6,7	11:16	photogra...	11:1,3,10
32:13,18	27:13	19:18	50:23	23:12	paper	21:2,20	32:3 41:8	

Nancianne Edwards

Nace vs. FCA, et al.

May 19, 2015

Page 6

12:15	54:1	58:4	36:2,14	rcox@eas...	34:5	relating 7:5	request	resigning
13:7,13	prison	publication	40:19	2:22	recommen...	21:22	14:4,18	18:2,8,10
17:17	32:11	31:17	41:8 43:3	reaching	45:15	relation	27:22,23	49:17
20:7 21:5	probably	published	43:16	38:18	recommen...	21:5	27:23	resources
35:24	19:5	31:20	44:2,4,8	read 4:21	11:19	relations	28:3,6,11	11:9,15
36:16	45:22	pull 28:8	44:15	26:14	recommen...	11:19	28:18,19	11:18
46:21	problem	pulled	45:4,13	27:3,9	45:10	relations...	28:24	14:9,16
47:2	43:7	16:13	48:11,16	32:13	record 8:3	relative	29:16	22:13
49:18,21	problems	28:10	48:19	51:17	36:21	33:16	23:24	
52:9	27:7 32:5	purpose	49:15	reading	38:11	58:12	34:1 41:7	47:22
55:12	43:2,20	34:19	52:3,9,20	25:22	55:16	release 25:3	50:18	51:7
positions	44:1	put 37:17	53:6 54:2	30:1,6	records	removed	requested	respond
45:9 47:4	procedure	37:17,20	54:6	46:8	13:22	41:1	28:10	7:21,23
47:6	38:23	38:10	Quakerto...	really 47:14	14:1,5,18	repay 34:20	50:15	8:18
posted	proceed 8:4	46:8	14:5	Realtime	27:20,24	34:24	requesting	10:16
49:18,21	process	53:19	Quakerto...	58:16	31:12	35:14	38:9	34:8 35:5
posting	6:10 8:17	P.C 2:19	10:1	reason 9:18	33:17,18	rephrase	requests	responded
49:18	25:8 38:4	3:18	question	18:17,18	44:16	6:23	28:1,2	28:5
50:1	38:6,7	p.m 1:13	4:4 6:20	55:2	red 46:8	replacem...	require	41:17
practice	39:11,14	56:12	6:21,22	reasons 7:7	referring	50:1	41:11	41:17
54:16	39:19,22	P.O 2:20	6:23,23	18:3,8,11	12:8	report	54:23	response
preferred	40:4,15		6:24 7:2	recall 6:5	refers 50:9	38:22,22	required	7:17 9:8
35:24	45:14	<u>Q</u>	7:3,6,15	9:13	reflects	39:2,17	22:11	14:3
prelimina...	48:7 53:1	Quakerto...	7:16,23	16:14,16	55:17	40:10,14	24:8	29:15
38:24	53:5 54:2	2:11 5:1	8:1,2,2,4	17:12,18	regard 26:5	reported	38:21	responses
premises	produce	5:3,14,16	8:5,10,11	19:13,22	26:10	4:23	40:13	38:9
33:18	5:15	5:23 6:8	9:6,12	21:4,24	27:12,19	14:21	53:1,4	responsib...
presently	Professio...	8:18,24	18:12	26:7 27:8	29:5 30:9	39:17	54:18,22	11:15
12:18	1:14 58:4	10:4,11	27:1 33:8	27:17,22	41:18	40:23	54:23	responsib...
press 27:6	58:16	10:15,22	33:22	27:23	42:3	41:13	requirem...	15:16
previous	program	11:5,24	52:22	28:7,17	regarding	43:12,14	24:1,4	responsible
21:6	21:12,13	12:19,20	questioning	28:18,23	5:2,12	reporter	25:7	11:17
39:14	Proof 22:9	13:3,12	16:21	29:1,24	16:14	1:14,15	54:20	15:12
previously	prospective	13:19	38:15	30:1,6	17:22	7:10,20	reserved	23:23
39:22	55:4	15:9,24	questions	32:4,7,12	18:7,17	58:4,16	4:4	41:16
44:5	Protective	16:3,18	6:17 7:11	35:2,4,8	19:17,19	58:16,22	resignation	53:10
principal	23:19	17:1,9,10	7:18,22	43:17	19:23	reporting	13:14	responsive
36:5,11	provide 9:7	17:23	8:7,14,19	47:3	27:7	27:5	18:16,18	9:10 37:9
45:10,15	44:18,22	18:24	9:8,10	receipt 22:3	29:16	39:17	18:19	restate 6:23
45:18,23	52:13	19:7,14	26:1,4	22:4 51:5	34:4 37:1	40:3	19:9	retrieve
45:24	provided	19:19,20	27:15	receive	37:3,15	reports	20:16,22	14:9
53:13,15	12:23	20:2,13	33:6	46:24	43:2,12	32:13,18	20:24	retrieved
print 27:6	14:2,23	21:11,19	42:13	received	43:24	represent	21:3	33:13
30:2	16:24	21:20	55:23,24	22:10	44:12	4:11	34:18	retrieving
prior 11:6	18:13	22:8	56:2,3,4,5	25:21	47:18	10:15	35:20	33:23
16:18	25:19	26:13	56:6	26:11,12	52:13	represent...	44:4	return
27:22,23	28:10,12	27:15,16	quick 6:16	26:21,24	Regardless	5:1,16	47:19	22:12
28:2,6,19	29:2,23	27:19	quickly	32:22	32:17	53:5	48:7,8,10	returned
28:23	36:22	29:14,20	6:14	33:10,16	Registered	29:20	48:18	20:9 22:9
29:15	45:1	30:5,9,10		37:12,14	1:14 58:3	50:3,16	50:3,16	returning
30:12	providing	30:13,24	<u>R</u>	receiving	58:16	represent...	50:20,21	51:6
32:19	23:12	31:12	rate 45:11	27:22	regulations	8:24	55:18	review 5:24
35:19	Public 1:15	32:19	46:12,14	recollection	51:16	reproduc...	55:18	23:11
39:1	41:16	33:1,3,7	46:22	related	58:20	resigned	5:5 35:22	33:1,24
48:24	42:2	33:21	51:4	35:21	10:8,8	reputation	35:23	39:15
52:13,23	54:15	34:4,13	rates 46:13	recollecti...	17:8 58:9	38:14	50:1	44:16

Nancianne Edwards

May 19, 2015

Nace vs. FCA, et al.

Page 7

reviewed	19:6,20	15:9 19:1	47:17	signing 4:2	40:21	sport 21:17	students	40:9
26:18	27:7,20	21:21	49:20	26:20	42:21	47:15	30:9 37:4	53:17
reviews	30:10	22:8 25:2	sentence	51:6	45:21	49:4,6	37:7	sure 4:21
13:14	32:5 33:2	27:13	50:13	similar	52:22	sports	subject	6:20,20
16:10	34:1,5,12	31:13	sentenced	22:14	someone	21:12	4:14 10:8	23:10
36:17	36:16	36:5,11	32:11	simply 6:22	27:9 28:8	31:24,24	36:15	26:14,17
Rice 12:24	37:2 43:2	46:3,5	separate	49:19	28:21	spring 4:19	37:9 42:6	39:1,15
right 9:21	43:21	47:9,11	37:23	since 9:14	53:19	21:17	43:1	44:23
40:12	47:19	48:17,19	September	11:4	something	47:15	44:19	53:2
45:6	51:1,9	48:20	11:11	34:10	12:8,10	48:22	50:5	suspected
ring 29:6	54:2,13	49:16	Serge 36:10	47:14	24:17,22	49:4,6,8	subjects	37:4
29:11	room-sett...	50:20	series 6:17	55:18	30:20	staff 12:2	13:11	suspicions
Road 3:9	24:18	51:4 52:4	service	sir 29:8	31:16	34:4	submitted	30:3
ROBERT	rumors	53:13	46:14	situation	37:17	start 11:10	48:14	44:12
2:19	37:3	54:22	Services	25:19	48:14	33:5	subpoena	suspicious
Romig 4:15	44:11	55:11,13	23:20	38:19	49:14	started	19:22	37:3
4:23 5:2	Russell	Schorn	set 58:7	six 44:10	50:21	17:13	27:24	Swedesford
5:3,9 7:5	3:14,24	29:6	setting	Slattery	sometime	starting	28:24	3:9
12:24	Ryan 3:14	sealing 4:2	24:19	29:11	28:4	49:9	29:2	sworn 4:7
13:17	3:24	search 8:23	seven 32:11	slip 22:12	32:10	starts 55:7	32:22,23	58:6
14:18	<u>S</u>	9:9 14:5	several	softball	somewhere	state 8:3	33:10	Sylvia 17:6
15:8,18	salary	14:17	34:21	4:24	37:18	18:9,10	subseque...	20:14
16:6,18	searching	34:7	35:18	12:16	soon 40:14	54:14	39:18	47:17
17:9	19:10	36:7	36:7	15:10	sorry 23:6	stated	substance	50:3
18:23	34:20	13:21	sexual 4:17	21:6,12	45:2 47:5	17:24	17:21	<u>T</u>
20:2,9,12	35:15	season	21:22	21:15	52:5	18:17,21	such-and-...	take 7:10
20:14	46:7,7	20:10,18	23:9	31:13	sort 33:15	States 1:1	47:2	9:20 12:7
21:10	same 28:11	21:6,15	25:16	46:6,11	44:24	1:15	sufficient	20:7,17
22:1,7	50:3	48:22,22	30:4,4	47:11	source 31:5	stationery	9:15	Suite 1:19
23:12	58:20	48:24	39:24	49:22	sources 9:3	48:17	23:13	statutory
25:18	SANTAR...	49:9,13	40:20,22	51:3	South 1:19	50:22	2:4,15	33:5
27:12	2:14 56:1	second 3:20	42:11	55:12	space 52:12	3:10	3:10	40:15
29:5,16	saw 10:13	6:1 30:19	43:5	some 4:17	speak 17:7	step 26:22	summer	51:9
30:3 31:2	32:13,18	31:1 35:9	sexually	5:2,12	27:1	27:1	4:20	taken 48:23
31:7,14	33:12	39:4	41:7	6:8 7:18	33:22	steps 33:15	11:2	58:11
34:11	52:18	45:13	shake 7:19	9:13	19:13	still 8:10	19:21	talk 13:21
42:8	says 22:7,9	see 18:14	sheet 16:8	12:11	38:6	13:2	13:7	talked
43:18	26:10,22	20:13	49:24	15:4,5	45:19	46:1,2	superinte...	18:22
44:1,7,13	46:20	27:2	shorten	16:20	42:22	42:22	superinte...	18:22
45:13	47:10	33:11	33:9	18:14	30:18,21	Street 1:19	19:24	51:19
46:5,17	48:9	seeing	shorthand	21:2,21	specific	2:3,14,20	supervised	talking
47:10	49:18	16:14	58:22	24:17,18	21:24	3:20	20:11	7:13 9:14
48:4,6,8	50:11	28:18	show 10:10	27:11	24:7,9	strike 13:15	21:9	22:20
48:16,18	51:5,15	seek 8:22	showed	30:2	25:17	16:9	42:22	28:2
49:17,20	Schoch	seen 10:11	44:5	31:16	41:15,20	21:15	supervising	46:19
50:4,11	14:13	28:20	shows	32:8,24	42:2	39:21	52:14	47:15
52:14,22	16:22	seminar	47:10	33:5	specifically	student	supervision	talks 23:8
53:11	19:16	25:14	sign 22:3	40:21	8:5 12:1	30:12	58:21	teacher
54:1	school 1:6	sending	22:12	44:18,21	21:13	37:15	supervisor	13:8
55:10	2:11,23	35:14,17	signature	51:15	32:7	38:4	20:3	30:18
Romig's	5:4,14,17	senior 15:9	22:13	53:5,6,7	specifics	39:24	43:18	40:9
5:10,13	5:23 6:8	46:6	51:9	55:23	6:2	40:18	superviso...	teachers
12:15	9:1 10:16	sense 12:6	signed 22:4	somebody	speech	41:9	21:1	12:2
13:12	10:23	12:10	22:7	8:18	25:14	42:10	supplied	53:21
16:15	11:6,24	sent 5:14	46:16,20	24:18	spoke 17:6	43:7	20:13	team 31:14
17:22	12:16	22:6 35:8	51:12	28:15	27:10	44:14	supposed	31:18,24

Nancianne Edwards

Nace vs. FCA, et al.

May 19, 2015

Page 8

43:14	18:14	17:18	52:2	<u>V</u>	23:7	56:9 58:6	52:16,17	2007/2008
46:6	20:19	36:11	type 13:24	VAKIL	26:20	witnesses	yielded 9:9	46:5 51:3
49:22	22:16	today 6:11	14:7	3:18	28:20	38:16	young 4:18	2008 21:16
teams	32:9	30:8	22:19	Valley 1:12	33:8 38:7	words 33:4	<u>Z</u>	22:14
31:24	33:22	31:10	24:19	2:9	40:13	34:3	Zachary	25:9 36:9
tell 9:7,11	40:5 44:4	topic 18:22	25:12	vault 33:14	44:11	work 6:7,9	51:2	2008/2009
9:15 23:2	45:12	37:10	31:17	verbal 7:17	46:3	34:22	14:13	55:14
32:15	52:6	43:5	32:1	35:7	49:23	35:24	16:22	2009 5:5
35:22	54:19	44:10,18	37:24	verbally	went 33:22	41:2 55:7	47:9	
48:2 49:5	third 42:6	topics 5:24	40:15,22	7:21	were 5:24	worked	<u>\$</u>	
telling 31:9	55:13	10:7,8,12	42:18	12:11	6:6,7	19:14	\$3,073.90	11:24
ten 48:17	thousands	10:17	43:6,6	25:15	11:5 12:4	working	51:4	21:10
tenure	35:3	17:2	53:17	VERONI...	12:15,22	18:24	\$3,135.38	47:15
19:20	three 24:9	19:17	types 23:7	3:19	14:6 15:3	54:5	46:15	55:10,15
34:12	32:11	34:8	<u>U</u>	very 7:12	16:11	workplace	<u>#</u>	2009/2010
36:2 54:2	46:4,13	36:12	toward	15:11	21:21,24	22:15	55:12	
term 36:8	47:10	Uh-uh	47:20	24:9	22:20	writing	#346 3:10	2010 5:6
37:12	49:7	37:4	under	55:23	23:13,14	12:8	<u>1</u>	15:11
52:8	52:16,17	43:21	49:18	56:8	23:15	23:13,14	1	20:15
terminati...	54:18,19	tracking	58:21	videos 37:6	25:14	23:15,15	1	43:4
13:14	54:21	49:24	understand	41:8	26:1 28:5	25:20	1st 5:7 32:9	47:18
terminati...	through	trained	view 34:1	29:1,10	29:7,21	10	21:16	48:15,21
14:6	6:11,13	24:1	6:21,22	virtue 26:2	30:2	25:9 57:1	48:22,22	
terminati...	6:14	trainer	6:24 8:12	visual 27:6	31:18	100 33:21	50:4	
36:18	16:20	24:17	9:16,22	voice 15:21	32:17	12th 55:10	55:19,20	
terms 11:18	32:15	training	13:16	volszewsk...	34:8 35:7	53:19	1389 2:20	2013 4:20
25:21	42:19	24:3,7,9	18:12	3:23	35:13	written	14th 48:21	32:9
testified 4:7	time 4:5	24:16	39:10	vs 1:5	36:12	15:4 26:3	15th 48:17	2014 11:4
testify 5:2	7:11 9:13	25:10,12	understa...	<u>W</u>	38:14	28:18,19	15-333 1:6	11:12
8:22	11:16	25:17	12:13	waiting	42:14,14	28:24	1500 2:3	32:10
testimony	15:8,17	trains	25:22	40:15	45:1	38:11	1503 1:19	39:8,23
39:10	15:18	24:18	35:23	waiting	54:19	46:19	17th 1:19	40:10
texting 37:6	16:13	transcript	understood	waved 4:3	we'll 6:1	www.bru...	18901 2:21	2015 1:8
40:20,20	18:23	7:11,20	7:3	Walnut 2:3	9:21 10:9	1:21	19 1:8	5:7,9
40:20	19:13	58:5	union 38:14	want 36:10	16:20	<u>X</u>	19th 22:14	10:5
Thank	20:21,24	trial 1:2 4:5	unit 38:14	44:21	18:14	X	19047 2:10	215.345.7...
55:23	21:2,20	true 58:5	49:7,16	50:7	45:12	X	19063 3:21	2:21
56:8	22:1	try 7:14	United 1:1	WARNER	we're 6:11	<u>Y</u>	19087 3:11	215.568.4...
their 24:14	23:14	13:22	1:15	9:14	9:14	Y	19102 2:4	2:5
34:5	25:13,18	15:22	unit-pay	2:13	47:15	year 21:7	19103 1:20	215.575.2...
38:10	26:14	40:20	47:4,5	wasn't	47:23	31:1,21	2:15	2:16
45:2 47:1	30:7 31:3	trying 5:12	unlawful	way 5:8	we've 36:13	46:5,10	<u>2</u>	215.750.0...
thing 6:19	32:8,23	Tuesday	22:11	5:13	5:13	46:14	2:10	
14:7 32:1	33:14	1:8	23:1,8	16:16	12:24	47:9,12	2:33 20:15	215.772.1...
35:9	34:15	turn 35:10	26:10	17:1	13:18	49:3 51:4	1:20	
40:23	35:13	turned	unless 7:24	Wayne	19:6 30:5	55:13,13	2003 11:11	2300 2:15
43:6	38:23	14:20	8:4,8	3:11	33:2,7	55:19	2007 5:5	255 1:19
50:22	39:3	16:11	58:21	24:21	44:8	yearbook	7:5 9:14	27 51:2
things 6:13	43:17	29:14	until 4:4	welcome	56:9	31:16,20	11:23	28 10:5
9:14	47:3,23	55:18	5:5 11:12	widely 4:22	32:2	15:11	295 3:9	
21:22,24	52:1,10	two 5:9 7:7	20:6	Welfare	20:1	yearly 12:4	21:10	
23:7	52:19	7:9,13	use 21:23	41:16	winter 49:8	38:2	<u>3</u>	
43:14	53:4,15	20:12	used 25:4,6	42:2	wish 8:9	19:14	40:17	3:00 1:13
think 5:4,5	54:5,13	22:6	52:10	54:15	witness	24:10	41:23	30 3:20
5:17,19	55:15	36:24	using 24:20	well 10:9	8:21	31:14	43:3	300 2:4
6:18	timing	51:23,24		14:15	15:22	32:11	52:20	31st 39:8
							53:9 55:2	

Nancianne Edwards

May 19, 2015

Nace vs. FCA, et al.

Page 9

39:22 40:10								
<u>4</u>								
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4:30 56:11								
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20:15								
47:18								
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50:4								
55:19								
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60 2:20								
610.585.0...								
3:22								
610.783.3...								
3:12								
680 1:11								
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<u>8</u>								
8 38:2								
40:17								
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<u>9</u>								
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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JAMES NACE AND APRIL NACE
as Guardians of E.N. a minor;

Plaintiff

v.

CIVIL ACTION NO. 15-333

PENN RIDGE SCHOOL DISTRICT, et al.

Defendants

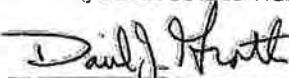
PLAINTIFF'S RULE 30(b)(6) NOTICE
OF DEPOSITION DIRECTED TO QUAKERTOWN
COMMUNITY SCHOOL DISTRICT

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, plaintiff will take the deposition upon oral examination of a representative(s) and/or designee(s) of Quakertown Community School District to discuss information known or reasonably available to The District with regard to the subjects/topics listed below. The deposition(s) will take place at the law offices of Begley, Carlin & Mandio, LLP, 680 Middletown Blvd, Langhorne, PA 19042 commencing at 3:00 PM on May 19, 2015. The District has a duty to designate witnesses with personal knowledge of the topics to be discussed, or to make a reasonable attempt to investigate and obtain facts and information regarding those topics.

This deposition will be taken by stenographic means before an officer authorized to administer oaths and will continue until completed. The deposition(s) will be taken for the purposes of discovery, for use at trial in this matter, and for any other purpose permitted under the Federal Rule of Civil Procedure.

HORNSTINE, PELLONI & HORNSTINE

Dated: April 28, 2015



BY: David J. Groth, Esq.

ATTORNEY FOR PLAINTIFF

Hornstine PELLONI & Hornstine

1500 Walnut Street, Suite 300

Philadelphia, PA 19102

(215) 568-4968

EXHIBIT

Quakertown-1
5-19-15

Appendix 1035

SUBJECTS TO BE DISCUSSED

1. Eric Romig's hiring, employment position, employment evaluations and/or reviews, and termination/resignation.
2. Complaints, allegations, or accusations regarding Eric Romig's job performance or behavior, including but not limited to any suspicions and/or rumors regarding any suspected inappropriate behavior toward female students or athletes, such as inappropriate physical contact, texting, language, photos or videos directed to, or exchanged with, female students.
3. Any facts or information indicating that Eric Romig attempted to induce, entice, persuade, convince or coerce any female student to engage in any form of inappropriate or explicit sexual activity.
4. Any concerns, problems, complaints or issues regarding Eric Romig's coaching activities at Quakertown between 2007 and 2010, inclusive.
5. Any information regarding any health issues or problems experienced by Eric Romig during his employment by Quakertown.
6. Any facts and information, as well as any rumors, suspicions or accusations regarding an inappropriate personal relationship between Eric Romig and Alicia Hughes, and/or any other female student or athlete at Quakertown.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JAMES NACE AND APRIL NACE
as Guardians of E.N. a minor,

Plaintiff

v.

CIVIL ACTION NO. 15-333

PENN RIDGE SCHOOL DISTRICT, et al.:

Defendants

CERTIFICATION OF SERVICE

I, David J. Groth, Esq., hereby certify that I served a true and correct copy of the above, Notice of Deposition on April 28, 2015, via First Class U.S. Mail addressed as follows:

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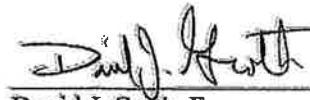
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Date: April 28, 2015



David J. Groth, Esq.